ESTTA Tracking number:

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Filing date:

03/21/2016

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD

Proceeding	91221325			
Party	Plaintiff Red Bull GmbH			
Correspondence Address	MARTIN R GREENSTEIN TECHMARK A LAW CORPORATION 4820 HARWOOD ROAD, 2ND FLOOR SAN JOSE, CA 95124 UNITED STATES MRG@TechMark.com, AMR@TechMark.com, LZH@TechMark.com, DMP@TechMark.com			
Submission	Stipulated/Consent Motion to Extend			
Filer's Name	Angelique M. Riordan			
Filer's e-mail	NDG@TechMark.com, MRG@TechMark.com, AMR@TechMark.com, LZH@TechMark.com, DMP@TechMark.com			
Signature	/Angelique M. Riordan/			
Date	03/21/2016			
Attachments	RB v. Jordi Nogues - Oppo No 91221325 - Stipulated Ext and Continued Suspension for Settlement.pdf(99275 bytes)			

CERTIFICATE OF ELECTRONIC FILING

I hereby certify that this correspondence is being filed electronically with the Trademark Trial and Appeal Board via ESTTA, on the date below:

March 21, 2016

/Angelique M. Riordan/ Angelique M. Riordan

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD

))	Consolidated Proceeding No. 91-221,32		
RED BULL GMBH,)	Opposition No.:	91-221,325	
)	Serial No.:	86/324,277	
	Opposer/Petitioner)	Trademark:		
)			
v.)			
)			
JORDI NOGUES¹/J	ORDI NOGUES, S.L.,)	Cancellation No.:	92-061,202	
)	Registration No.:	4,471,520	
)	Trademark:	\mathcal{C}	
	Applicant/Registrant)			
)			
				BADTORO	

STIPULATED MOTION TO EXTEND BOARD-SET DEADLINES BY 60-DAYS AND TO CONTINUE SUSPENSION OF PROCEEDINGS

Opposer/Petitioner, Red Bull GmbH ("Red Bull"), and Applicant/Registrant, Jordi Nogues/Jordi Nogues S.L. ("Jordi") (collectively, the "Parties"), are engaged in settlement negotiations and, accordingly, have agreed and stipulated, subject to the Board's approval, to extend Red Bull's time for filing its Amended Notice of Opposition and Motion for Summary Judgment in the above-captioned consolidated proceeding by 60-days. Additionally, the Parties have agreed to continue to the current suspension of the above-captioned consolidated proceeding accordingly. The Parties contend that good cause has been shown where this motion is being filed with consent and the Parties are involved in settlement negotiations.

This request is being filed with the express consent of Jordi, through its counsel, Joshua Rupp. It is submitted that, in view of the foregoing, good cause has been shown, and it is respectfully requested that this stipulated motion to extend and continue the Board-ordered suspension be granted.

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¹ Improperly amended to Jordi Nogues, S.L.

Dated: March 21, 2016 Respectfully submitted,

Neil D. Greenstein Martin R. Greenstein Angelique M. Riordan Leah Z. Halpert TechMark a Law Corporation 4820 Harwood Road, 2nd Floor San Jose, CA 95124-5237

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E-mail: NDG@TechMark.com; MRG@TechMark.com

By: /Neil D. Greenstein/ Neil D. Greenstein Attorney for Red Bull

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing **STIPULATED MOTION TO EXTEND BOARD-SET DEADLINES BY 60-DAYS AND TO CONTINUE SUSPENSION OF PROCEEDINGS** is being served on March 21, 2016, by deposit of same in the United States Mail, first class postage prepaid, in an envelope addressed to counsel for Applicant/Registrant at:

JAMES T. BURTON KIRTON MCCONKIE 60 E SOUTH TEMPLE STE 1800 SALT LAKE CITY, UT 84111-1032 UNITED STATES

> /Angelique M. Riordan/ Angelique M. Riordan